

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MATT MADDOCK,

Plaintiff,

v.

THE MICHIGAN HOUSE OF REPRESENTATIVES;
THE MICHIGAN HOUSE OF REPRESENTATIVES'
BUSINESS OFFICE; TABBATHA BIRMINGHAM,
in her official and personal capacities; JOSEPH TATE,
in his official capacity as The Speaker of the House for
the State of Michigan, and in his personal capacity;
DOUGLAS SIMON in his official capacity as Director
of the House Business office and in his personal
capacity; LISA CURTIS, deputy director of Michigan
House Business office, in her personal and official
capacities; and AMBER MCCANN, Press Secretary
for Speaker of the House, in her personal and official
capacities,

Defendants.

Case No. 1:24-cv-00257

Hon. _____

**PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION OR, IN THE
ALTERNATIVE, FOR INJUNCTION PENDING APPEAL**

Plaintiff, Matt Maddock, files this Motion for a Preliminary Injunction pursuant to Fed. R. Civ. P. 65 to enjoin Defendants, The Michigan House of Representatives, The Michigan House of Representatives Business Office, Tabbatha Birmingham, Joseph Tate, Douglas Simon, Lisa Curtis, and Amber McCann ("Defendants"), from promulgating and enforcing Legislative Counsel Printing Rule 6 and House of Representatives Printing Guidelines Rule 3(g), 3(h), & 3(af). Such regulations constitute an unlawful prior restraint and serve as an unconstitutional, viewpoint-based restriction in violation of the First Amendment of the U.S. Constitution and Article I, §§ 3 & 5 of the Michigan Constitution. Should the Court decline to enter a preliminary injunction, Plaintiff requests, in the alternative, the Court enjoin Defendants from promulgating and enforcing

Legislative Counsel Printing Rule 6 and House of Representatives Printing Guidelines Rule 3(g), 3(h), & 3(af), pending appeal, per Fed. R. App. P. 8.

Pursuant to LR 7.1(a), Plaintiff has not obtained Defendants' concurrence with this Motion, as Defendants have not yet been served in the above-captioned matter, and Plaintiff has not yet been in contact with Defendants.

Dated: March 12, 2024.

Respectfully Submitted,

/s/ Marc J. Randazza

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Matt Maddock*